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**Subject:** NW Natural and Siltronic, Request to Revise and Add to Gasco Sediment Project EECA Comments  
**Date:** 09/20/2012 06:07 PM

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Hello Sean.

DEQ understands EPA intends to transmit the "final" set of Gasco-specific EECA comments this week (i.e., the site-specific review and comment period for the document has ended).

Before the comments are transmitted to NW Natural and Siltronic, DEQ requests that 1) Gasco-specific comment #87 be revised; and 2) a "placeholder comment" for Appendix G be inserted into the Gasco-specific comments set to inform NW Natural that agency review is ongoing and will be completed within a timeframe for consideration in the Final Gasco EECA.

The revised version of Comment #87 and the basis for requesting the placeholder comment for Appendix G are provided below.

REVISED VERSION OF COMMENT #87

BEGIN COMMENT - DEQ considers the riverbank risk screening and hot spot screening evaluations described in the Draft EE/CA and documented in Appendix F and Appendix H to be preliminary. As indicated by NW Natural, the Draft EE/CA screened riverbank data available from the top of bank down to approximately 13 feet NAVD88. NW Natural is performing a human health and ecological risk assessment of the Gasco Site uplands (Gasco Uplands RA) that will integrate and analyze riverbank and uplands data consistent with the human health and ecological exposure areas identified for the uplands. The hot spot determination for the Gasco Site uplands will be conducted following completion of the Gasco Uplands RA. DELETE [The Draft EE/CA should be revised to reflect t]

INSERT [T]he findings and conclusions of the approved Gasco Uplands RA and hot spot determination INSERT [should be fully incorporated into the Gasco Sediment Project during the Preliminary Design Development phase] to ensure the Gasco Sediment Cleanup Action achieves uplands and in-water RGs.  
- END COMMENT

The above change is intended to mirror integration of EPA's review of the BLRA into the Gasco Sediment Project schedule as shown by Figure 4 of the SOW.

PLACEHOLDER COMMENT FOR APPENDIX G

As indicated in our July 17, 2012 e-mail transmitting our initial comments, DEQ requested additional time to complete our review of the Draft Gasco EECA because the draft Portland Harbor Feasibility Study (Draft PHFS) was received within essentially the same timeframe. As a result, important elements of the Draft PHFS were fully integrated into the Draft Gasco EECA. DEQ had difficulty organizing and coordinating our reviews of the Draft Gasco EECA as it required simultaneous review of the Draft PHFS. The review process was inherently inefficient.

The situation was further complicated by DEQ's receipt of the Draft Arkema EECA less than two weeks after we sent our initial comments on the Draft Gasco EECA. Given the timeframe for reviewing the Draft Arkema EECA, DEQ's focus shifted away from conducting our more detailed review of the Draft Gasco EECA.

DEQ was interested in having additional time to review sections of the Draft Gasco EECA related to the use and interpretations of data gaps sampling results; uplands and in-water human health and ecological risk screening criteria; and in-water and riverbank risk evaluations. DEQ was particularly interested in reviewing Appendix G (Project AIR Re-Screen) more thoroughly. Appendix G represents work that was postponed in June 2010 to facilitate in-water data gaps sampling field work and in recognition that screening criteria for the in-water BLRA and uplands RA were under development.

DEQ understands that Appendix G should screen available data for the complete list of analytes using the most current agreed-upon in-water and uplands risk-based screening criteria. The primary objective of the analysis is to evaluate the risk associated with sediment contamination and support NW Natural's evaluation and selection of sediment remedial alternatives. In addition, the appendix is supposed to fully address EPA's May 4, 2010 comments on the Draft AIR and Data Gaps QAPP with regard to analyte lists, lines of evidence, and screening criteria.

DEQ is concerned Appendix G has not undergone sufficient review to determine whether the above objectives have been met and whether screening has been completed consistent with commitments made by NW Natural. I don't think our concern is unfounded. Although Appendix G represents approximately half of the Draft Gasco EECA document, there do not appear to be any comments on the appendix in either of EPA's "Harbor-wide" or "Gasco-specific" comment sets.

I'm also concerned that if we don't indicate Appendix G is being further reviewed, the two companies will use the two comments sets to question the validity of any future comments related to the appendix (the argument would be something like...EPA/DEQ had an opportunity to comment on this before and didn't, now you're raising new issues related to work we thought was complete and accepted).

Based on the information summarized above, DEQ requests a "placeholder comment" for Appendix G be inserted into the Gasco-specific comments set to inform NW Natural that agency review is ongoing and will be completed within a timeframe for consideration in the Final Gasco EECA.

Sean, thanks in advance for revising Comment #87 as indicated in this e-mail and considering our request for the Appendix G placeholder comment. Hope you have a good evening and let me know if you have questions regarding this e-mail.

Dana

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